

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

MAXWELL KADEL, *et al.*,

Plaintiffs,

v.

DALE FOLWELL, in his official capacity as
State Treasurer of North Carolina, *et al.*,

Defendants.

Case No. 1:19-cv-00272-LCB-LPA

SUPPLEMENTAL DECLARATION OF OMAR GONZALEZ-PAGAN

Pursuant to 28 U.S.C. § 1746, I, Omar Gonzalez-Pagan, do hereby declare as follows:

1. I am over 18 years of age.
2. I am Counsel at Lambda Legal Defense and Education Fund, Inc. and serve as counsel of record for the plaintiffs in the above-captioned matter.
3. I have personal knowledge of the stated herein, except those stated on information and belief, and if called upon, could and would testify competently to them.
4. I submit this declaration in support of Plaintiffs' Reply in support of Plaintiffs' Motions to Exclude Expert Testimony of Dr. Peter Robie (ECF No. 202), Dr. Paul W. Hruz (ECF No. 204), Dr. Paul R. McHugh (ECF No. 206), Dr. Patrick W. Lappert (ECF No. 208), and Dr. Stephen B. Levine (ECF No. 212).

5. Attached as **Exhibit A** is a true and correct copy of Information Memorandum Log No. ACYF-CB-IM-22-01 issued by the Administration of Children, Youth and Families of the U.S. Department of Health and Human Services on March 2, 2022.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated this 9th day of March, 2022.

/s/ Omar Gonzalez-Pagan
Omar Gonzalez-Pagan